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ICC Docket No. 01-0423

I.C.C. DOCKET NO. 01-0423

Response of Commonwealth Edison Company

Staff X Exhibit No. 17

To Staff Data Request BAL 4.01-4.02

Witness

Dated October 11, 2001

Date 11/5/01 Reporter

**BAL 4.01** Referring to Mr. DeCampi's rebuttal testimony at page 6, please provide the following:

a. Mr. DeCampi's "assessment" of ComEd's "entire construction schedule in the aftermath of ComEd's issuance of its own investigative report in 1999", line 165.

b. Mr. DeCampi's "analysis" which "showed that there was no major project performed that a prudent utility company would not have undertaken", line 167.

c. Mr. DeCampi's "determinations" made with respect to whether a premium was paid to "construct projects in the aftermath of any of the investigative reports relied upon by the intervenor witnesses", line 171.

Include all workpapers, which support Mr. DeCampi's assessment, analysis and determinations referenced on lines 165, 167, and 171 respectively.

**Response:**

- a. Mr. DeCampi did not prepare a written assessment. Mr. DeCampi has independent knowledge of ComEd's construction schedule based upon his ordinary course of business and responsibilities as Vice President of Engineering and Technical Analysis. His job inherently brings him into contact with such information. Further, Mr. DeCampi reviewed the projects and schedules contained in the investigation report. Additionally, ComEd witness Dr. James Williams testified in rebuttal on this subject, stating the following:

*"... project schedules from 1998 through 2000 were not completed "early". Project schedules, including Asea Brown Boveri ("ABB") project schedules, did not deviate from ComEd historical project schedules. These time-lines were in line with industry standard project schedules." (ComEd Witness Williams, ComEd Exhibit 25.0, Page 3, lines 52-56.)*

Mr. DeCampi did not rely on any specific workpapers.

- b. Mr. DeCampi did not prepare a written analysis. Mr. DeCampi has independent knowledge of ComEd's major projects based upon his ordinary course of business and responsibilities as Vice President of Engineering and Technical Analysis. His job inherently brings him into contact with such

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information. Mr. DeCampi also reviewed the investigation report and did not identify any projects he deemed to be imprudent. Additionally, his rebuttal testimony discusses the five major projects listed in ComEd Exhibit 6.1. [ComEd Exhibit 26.0, page 6, lines 161-164].

A major reason ComEd made additional investments in its distribution system is the substantial increase in load growth in its service territory. Capital investments to service load growth are both necessary and reasonable. Load growth is discussed further in ComEd's response to Staff data request BAL 3.03.

Mr. DeCampi did not rely on any specific workpapers. ComEd notes that distribution project evaluations and studies documents, which are highly voluminous, were made available for review over a month ago.

- c. Mr. DeCampi did not prepare a written "determination." In certain of ComEd's rebuttal testimonies, the issue of "premiums" and related points are extensively discussed. Mr. DeCampi is not always the witness or primary witness on these issues, but he has independent knowledge of ComEd's projects based upon his ordinary course of business and his responsibilities as Vice President of Engineering and Technical Analysis. His job inherently brings him into contact with such information. Mr. DeCampi's "determinations" are based upon his independent knowledge, the knowledge of other ComEd witnesses as presented in their testimony in this proceeding, and his general background and experience in the electric utility industry.

See also ComEd's response to Staff data request BAL 3.02.

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